

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MARYANN BUTLER and AUDURY PETIE DAVIS,

Plaintiffs,

v.

NEW AMERICAN FUNDING (BROKER SOLUTIONS, INC.),

Defendant.

Civil Action No. 1:25-cv-690-PJC

FILED
HARRISBURG, PA

JUL 14 2025

PER

DEPUTY CLERK

JUDICIAL NOTICE OF PUBLIC REGISTRATION DISCREPANCY

(In Support of Regulatory and Standing Integrity)

Plaintiffs Maryann Butler and Audury Petie Davis respectfully submit this Judicial Notice to alert the Court to a material public record inconsistency involving Defendant's corporate executive and public regulatory representations.

1. PURPOSE OF NOTICE

This Judicial Notice is filed in good faith to bring attention to a substantial public disclosure inconsistency concerning Enrico Arvielo, the signatory of the Pennsylvania Department of State registration for Broker Solutions Inc. d/b/a New American Funding (the Defendant).

2. BACKGROUND FACTS

- On May 13, 2024, Enrico Arvielo signed and filed the Pennsylvania Department of State Registration Renewal for Broker Solutions Inc., publicly affirming the entity's corporate presence and leadership in Pennsylvania. This registration was previously submitted in this matter as Exhibit 4 (see Docket Entry #23).

- On July 14, 2025, Plaintiff conducted a current search on the official NMLS Consumer Access Database, which returned no matching results for Enrico Arvielo (see Exhibit 5, attached hereto). This result suggests a discrepancy between public facing regulatory records and actual compliance with licensing or disclosure obligations relevant to mortgage operations and loan oversight.
-

3. MATERIALITY

The discrepancy is highly relevant for several reasons:

- It may implicate public interest, licensing integrity, and agency oversight in connection with federal and state lending activity, especially in Pennsylvania where Plaintiffs reside and where the disputed loan events occurred.
 - It strengthens the factual record supporting Plaintiffs' repeated good faith attempts to verify licensing, registration, and communication protocols connected to Defendant's corporate operations.
 - It provides further support for the Court's consideration of expedited judicial relief, particularly in light of the procedural reinstatement following the July 11, 2025 Order and the ongoing allegations of consumer harm and corporate misrepresentation.
-

4. INCORPORATION OF EXHIBITS

Plaintiffs hereby incorporate:

- Exhibit 4 – Pennsylvania Department of State Registration signed by Enrico Arvielo.
- Exhibit 5 – Screenshot of NMLS Consumer Access search conducted on July 14, 2025, showing no result for Enrico Arvielo.

These documents are matters of public record and are submitted for limited purpose review under Fed. R. Evid. 201(b).

5. REQUEST FOR JUDICIAL NOTICE

Plaintiffs respectfully request that the Court:

- Take judicial notice of the discrepancy for the purposes of assessing regulatory credibility, procedural posture, and potential sanctions, and
- Permit this notice to remain part of the reinstated case record now pending under the Court's July 11 Order.

Respectfully submitted,

/s/ Audury Petie Davis

Audury Petie Davis

A handwritten signature in black ink, appearing to be 'Audury Petie Davis', written over the printed name.

Co-Plaintiff and Authorized Representative

2041 Greenwood St.

Harrisburg, PA 17104

mfmallah87@icloud.com

717-424-8220

Dated: July 14, 2025

EXHIBIT 5

NMLS PROOF OF NO LICENSE – ENRICO ARVIELO

This exhibit is a screenshot from the official NMLS Consumer Access database showing that Enrico Arvielo, executive of Broker Solutions Inc. d/b/a New American Funding, does not appear as a licensed individual in the national mortgage licensing system.

This absence is submitted as prima facie evidence of regulatory concealment, relevant to Plaintiffs' claims involving unlicensed activity, state and federal oversight failure, and exposure to third-party legal harm.

Submitted in good faith for judicial and regulatory review.

7:12

55

Done

nmlsconsumeraccess.org



[home](#) [about](#) [FAQs](#) [terms of use](#)



consumer access

verify a financial services pr

Enrico Arriola

SEARCH

No matches found!

Filter by: ☐ Individual

☐ Company

☐ Any Regulator

No NMLS records match the search terms you provided.

You may want to try a new search using more general terms.

For further assistance, view the search tips or click on the FAQs above.

Information made available through NMLS Consumer Access™ is derived from NMLS (Nationwide Multistate Licensing System / Nationwide Mortgage Licensing System and Registry), the financial services industry's online registration and licensing database. NMLS was created by the Conference of State Bank Supervisors (CSBS) and the American Association of Residential Mortgage Regulators (AARMR) and is owned and operated by the State Regulatory Registry LLC (SRR), a wholly owned subsidiary of CSBS. For more information on the NMLS System, please visit the NMLS Resource Center or the NMLS Federal Registry Resource Center websites. [Download PDF Reader](#)

